

July 16, 2001

Mr. Elan Allen Reed Engineering 2424 Stutz Drive Suite 400 Dallas, Texas 75235

RE: Comments for Phase I Environmental Site Assessment and Limited Asbestos-Containing Material Survey for 3103-3129 Grand Avenue, Dallas, Texas

Dear Mr. Allen:

The City of Dallas Brownfields Program staff and the Environmental Protection Agency Brownfields staff have reviewed the referenced document received on July 10, 2001 and have the following comments:

## City of Dallas

Page 4, Executive Summary. Four registered underground storage tanks (USTs) are discussed here and on pages 23/24. In the text of the report, please provide names and address of <u>all</u> four sites, USTs present, and orientation of the four sites, southeast, northeast, etc., in reference to the subject property. The table will be for reference.

Page 5, Executive Summary. Seven leaking petroleum storage tank (LPST) sites are discussed here and on page 24. Please provide similar information requested above.

Page 15, Section 5.3 Site Hydrology. Will Reed Engineering please provide a copy of information referenced from the Texas Water Department of Water Resources Report, 269. which references the four water wells within a two-mile radius of the subject property. The addresses and depths of wells will be useful.

Page 19, Section 6.2 Limited Asbestos Survey. The report mentions the presence of black mold. There are various species of molds which, at some time in their life cycle, may be black in color. Please provide additional information and possible response action.

Pages 23/24, Section 7.0 Regulatory Status Review. Four registered USTs are discussed. As previously requested, please provide names and address of all four sites, USTs present, and orientation of the four sites, southeast, northeast, etc., in reference to the subject property.

Pages 23/24, Section 7.0 Regulatory Status Review. Section 5.3, Site Hydrology states that groundwater flow direction at the site is presumed to be to the southeast or southwest, but

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generally to the south toward the Trinity River. Please explain why UST/LPST sites which are upgradient or crossgradient, to the northeast and northwest, are not a potential environmental concern.

Page 25, Section 7.0 Regulatory Status Review. The City of Dallas Fire Department Fire Prevention, Education & Inspection Division discussion indicates both that the information has not been received and is included in Communications. Please correct.

Communications. The Fire Dispatch records included in this section should be recopied to ensure the complete documents are included.

Communications. If possible, copies of several permits need to be recopied to improve legibility. These include:

Electrical Permit No. 97973

Application for Certificate of Occupancy
Authorization - Coin Laundry
Two document, probably front and back, of 3103 Grand Avenue
Authorization - Laundry and dry cleaning.

Figure 9. It appears that the Diamond Shamrock Station is now a Texaco station. Please clarify in the figure, the text, and in Tables III and IV.

Figure 9. Building 4, the former W.M. Smith Electric building is not indicated as having a UST. Throughout the text, a UST at this location is referenced. The figure should reflect the text.

Please provide copies of applicable licenses for environmental personnel who participated in this study.

## EPA Region 6

Section 6.4. Recommend contacting utility company to confirm that transformers are non-PCB transformers. Also, the text references two utility poles with transformers along the north property line. Figure 2 depicts seven pole-mounted transformers on or near the property line. Please clarify.

Illustrations, Figure 2. There is one symbol, "\_\_\_\_\_, \_\_\_\_, which is not listed in the legend. It doesn't appear to be the fence line, which is denoted as "\_\_\_\_ x \_\_\_\_, I'm assuming it is the property line but it should be clarified. Also suggest including an arrow indicating general surface water flow direction.

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The report is excellent. We appreciate your efforts.

Following receipt of the Final report, we will coordinate the follow up meeting with the client, Reed Engineering, the Environmental Protection Agency representative, and the City to discuss the findings, recommendations and next steps.

If you have questions, do not hesitate to call.

Sincerely

Ann Grimes

Project Manager

c: Dwayne Ford, EPA